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May 14, 2004

Chairman Deborah Taylor Tate  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Petition for Leave to Intervene  
Docket No. 03-00633

Dear Chairman Tate:

Enclosed for filing in the above-referenced proceeding are the original and thirteen (13) copies of SprintCom, Inc. d/b/a Sprint PCS' Petition for Leave to Intervene. Also enclosed is a check in the amount of \$25.00 for the filing fee.

If I can be of assistance, please call me at your convenience.

Sincerely yours,

Edward Phillips

HEP:sm

Enclosures

cc: R. Dale Grimes  
Timothy C. Phillips  
Melvin J. Malone  
Richard Collier

3. Sprint PCS is a Commercial Mobile Radio Services ("CMRS") provider authorized by the Federal Communications Commission to provide wireless service in Tennessee

and to enter into interconnection agreements for the exchange of traffic with incumbent local exchange carriers pursuant to the federal Telecommunications Act of 1996.

4. Sprint provides services in many of the counties in which the members of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives operate (the "Rural Coalition").

5. The FCC has long determined and affirmed, time and again, the competitive and consumer protection policies that underpin its mandate regarding number portability. All local exchange carriers, rurals included, have been on notice of number portability for many years.

6. Pursuant to the FCC's orders and rules regarding number portability, Sprint has been required to allow customers to port their numbers out and to accept new customers with numbers to be ported in, and Sprint is compliant with said orders and rules.

7. Rural consumers will likely seek to port their landline numbers to Sprint on or after May 24, 2004, the mandated deadline for LNP in the areas outside the top 100 Metropolitan Statistical Areas ("MSAs"). Sprint will face consumer frustration, as well as loss in business, if it is forced to deny customer porting requests due to LEC waivers.

8. As a CMRS provider in the State of Tennessee, Sprint has submitted bona fide requests ("BFRs") to eight (8) of the twenty (20) members of the Rural Coalition, including Ardmore Telephone Company, Inc., Ben Lomand Rural Telephone Cooperative, Inc., Millington Telephone Company, Inc., North Central Telephone Co-op, Tellico Telephone Company, Inc., Tennessee Telephone Company, Twin Lakes Telephone Cooperative Corp. and United Telephone Company, Inc. consistent with the FCC's number portability rules and orders.

9. The request for a suspension pending the conclusion of this proceeding is inconsistent with the FCC's rules and orders on number portability.

10. The request of the Rural Coalition is inconsistent with the public interest, convenience, and necessity.

11. The subject of this proceeding may therefore directly affect Sprint's operations in the State of Tennessee.

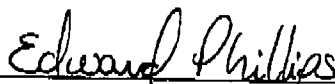
12. As shown above, Sprint's legal rights, duties, privileges, immunities or other legal interests may be determined in this proceeding.

13. Because of its direct interest in this proceeding, Sprint respectfully seeks to intervene in this matter.

14. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention.

WHEREFORE, based on the foregoing, Sprint respectfully requests that the Authority grant this Petition and permit Sprint to become a full party of record in this docket.

Respectfully submitted this the 14<sup>th</sup> day of May 2004.



Edward Phillips

SprintCom, Inc. d/b/a Sprint PCS

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Petition for Leave to Intervene of Sprint upon all parties of record to this Docket by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.

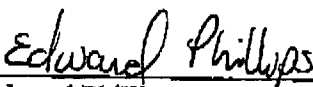
This 14<sup>th</sup> day of May 2004.

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\_\_\_\_\_  
Edward Phillips  
SprintCom, Inc. d/b/a Sprint PCS

## FACSIMILE TRANSMISSION

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Number of pages including this page: 6

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